

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**BRIDGET WASHINGTON, Individually
and as Next Friend of M.B.1 and M.B.2,
Minor Children,** §
§
§
§

Plaintiff, §
§
§
§

VS. §
§
§
§

CIVIL ACTION NO. 4:19-cv-04546

THE MEET GROUP, INC., §
§
§
§

Defendant §
§

PLAINTIFF'S NOTICE OF DISMISSAL

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiff BRIDGET WASHINGTON, Individually and as Next Friend of M.B.1 and M.B.2, Minor Children, files her notice of dismissal under Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure.

On October 2, 2019, Plaintiff sued Defendant in the 215th District Court of Harris County, Texas. Defendant removed Plaintiff's suit to Federal Court.

A plaintiff may unilaterally dismiss her action without prejudice by filing a "notice of dismissal before the opposing party serves either an answer or a motion for summary judgment." FED. R. CIV. P. 41(a)(1)(A)(i). "Federal Rule of Civil Procedure 41(a)(1)(A)(i) grants [Plaintiff] an absolute right to dismiss [her] lawsuit before the defendant has filed an answer or a summary judgment motion. *Welsch v. Correct Care, L.L.P.*, 915 F.3d 341 (5th Cir. 2019).

Defendant has been served with process and has not served an answer or a motion for summary judgment.

This case is not a class action under Rule 23 F.R.C.P., a derivative action under Rule 23.1, or

an action related to an unincorporated association under Rule 23.2.

A receiver has not been appointed in this case.

This case is not governed by any federal statute that requires a court order for dismissal of the case.

Plaintiff has not previously dismissed any federal- or state-court suit based on or including the same claims as those presented in this case.

This dismissal is without prejudice.

Respectfully submitted,

THE LAW OFFICE OF NHAN NGUYEN

/s/ Nhan Nguyen

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ATTORNEYS FOR PLAINTIFF

CERTIFICATE OF SERVICE

I certify that on December 5, 2019, a true and correct copy of the foregoing document was served on all counsel of record, as follows:

Carlos R. Soltero, Esq.
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/s/ Nhan Nguyen
Nhan Nguyen